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March 12, 2020

Magistrate Judge Steven L. Tiscione United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> Re: 1:19-cv-05745-EK-ST Gensberg v. Aldi Inc.

Dear Magistrate Judge Tiscione:

This office represents the plaintiff. In accordance with your Honor's Individual Practice Rules, plaintiff, jointly and with consent of defendant, requests an adjournment of the conference scheduled for Tuesday, March 17, 2020 and the submission of the discovery plan worksheet on Friday, March 13, 2020.

There has been one previous request for an adjournment of the conference, which was granted. Defendant consents to and joins plaintiff in the present request. The reason for this request is because the likely counsel for defendant is still working through complicated indemnity issues with several suppliers of the Product at issue in the complaint before that attorney-client relationship can be formalized.

The parties suggest an adjournment date of Friday, April 24, 2020 with the discovery plan worksheet submitted prior to this date as required by the Court. The requested adjournment does not affect any other scheduled dates. The request is submitted at least 48 hours prior to the conference date. Thank you.

Respectfully submitted,

/s/Spencer Sheehan Spencer Sheehan

## **Certificate of Service**

I certify that on March 12, 2020, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel			$\boxtimes$	
Plaintiff's Counsel				
Courtesy Copy to Court				
		/s/ Spencer Sheehan		